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April 22, 2025

Hon. J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Rafael Alvarez
24 Cr. 221 (JPO)

Your Honor:

Along with Michael K. Bachrach, Esq. I represent Rafael Alvarez in the above-captioned matter and write today for a modification of the defendant's bond so as to allow travel to the University of Pittsburgh in order to pick up his student daughter and her belongings from the dorm at the end of her freshman school year. Mr. Alvarez plans to travel to the university by automobile on Tuesday April 29, 2025 and return by automobile on Wednesday April 30, 2025.

Mr. Alvarez also seeks permission to attend the International Franchise Association Show in Miami, Florida in May. In order to secure plane tickets for this trip he needs to have his driver's license updated to an Enhanced or Real ID Driver's license. Accordingly, in the event Mr. Alvarez cannot use other means of citizenship proof, we respectfully request that Your Honor approve Pretrial's temporary one day return of Mr. Alvarez' passport for the sole purpose of his obtaining the updated driver's license necessary to secure plane travel. It is understood that Pretrial's release of the passport will be for one day only to accomplish that end and that Mr. Alvarez will provide Pretrial with proof of his appointment at the DMV. If approved, Mr. Alvarez plans to leave on May 8, 2025 and return Sunday, May 11, 2025. A detailed itinerary will be provided to Pretrial prior to departure.

No other modifications of Mr. Alvarez' bail conditions are being sought.

Pretrial Officer Andrew Abbott and Assistant United States Attorney David Felton on behalf of the Government have no objection to the travel requests.

Defendant Alvarez' current bail conditions include a \$600,000.00 appearance bond co-signed by four financially responsible individuals and secured by real property located in Cortland Manor, New York. His travel is restricted to the Southern and Eastern Districts of New York. He is also required to seek and maintain employment.

Thank you once again for your consideration and continued courtesies to counsel.

Respectfully submitted,



Richard H. Rosenberg
Michael K. Bachrach

cc.: Pretrial Officer Abbott,
A.U.S.A. Felton

Granted.
So ordered.
4/22/2025



J. PAUL OETKEN
United States District Judge